

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

ANA WEBB, et al.,

Plaintiffs,

v.

VOLVO CARS OF N.A., LLC,  
VOLVO CAR CORPORATION, and  
VOLVO CARS OF N.A., INC.,

Defendants.

Civil Action No. 13-CV-2394-MMB

**DEFENDANTS' ADDITIONAL EXHIBIT 99-1 EXHIBIT**

Defendant, Volvo Cars of North America, LLC (“VCNA”), improperly also named as Volvo Cars of N.A., Inc., and Volvo Car Corporation (“VCC”) (collectively “Volvo”), at the request of the Court, attaches hereto a more readable copy of Motion to Dismiss Exhibit “1” (two different versions attached).

Dated: February 16, 2018

Respectfully submitted,

By: /s/ Peter W. Herzog III  
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Attorneys for Defendants,  
Volvo Cars of North America, LLC  
and Volvo Car Corporation

**Certificate of Service**

I, Peter W. Herzog III, certify that the foregoing was electronically filed on February 16, 2018 using the Court's CM/EMF system, and was thereby served upon all registered users in this case.

By: /s/ Richard B. Wickersham, Jr.

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STORE IN A SAFE PLACE. IF LOST APPLY FOR A DUPLICATE. ANY ALTERATION OR ERASURE VOIDS THIS TITLE.



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IF LOST APPLY FOR A DUPLICATE - ANY ALTERATION OR ERASURE VOIDS THIS TITLE

B.C.

(TYPE OR PRINT) Certificate of Title must be submitted within 20 days, unless the purchaser is a registered dealer holding the vehicle for resale.  
**WARNING - FEDERAL AND STATE LAWS REQUIRE THAT YOU STATE THE MILEAGE IN CONNECTION WITH THE TRANSFER AND OWNERSHIP OF THIS VEHICLE.**

1. **Owner's Name:** \_\_\_\_\_ **Address:** \_\_\_\_\_ **City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip:** \_\_\_\_\_

**CHECK HERE IF APPLICATION FOR DEALER TITLE, AND COMPLETE SECTION D, TITLING FEES**

MV-3 (8-08)

Commonwealth of Pennsylvania  
PA Department of Transportation  
Bureau of Motor Vehicles  
Harrisburg, PA 17104-2518

### MOTOR VEHICLE VERIFICATION OF FAIR MARKET VALUE BY THE ISSUING AGENT

090345

This form is used in conjunction with Forms MV-1, MV-4ST, MV-217A and an on-line processing Applicant Summary Statement.

FOR DEPARTMENT USE ONLY

TYPE OR PRINT ALL INFORMATION AS REQUESTED

**A VEHICLE DESCRIPTION**

Model Year	Model of Vehicle	Model	Body Type	Purchase Price
1997	Volvo		SUV	
Vehicle Identification Number (VIN)	VIN: YV1LS0540V1394826189,000 <input checked="" type="checkbox"/>			
Order/Dealer Rating	(No Tenth)			

**B AGENT VERIFICATION OF FAIR MARKET VALUE - Check (✓) the appropriate block**

I certify that the average Fair Market Value for the vehicle described above is as verified by the current edition of a PennDOT approved publication.

Name of Publication: Black Book

This vehicle or the fair market value for this vehicle was not listed in a current edition of a PennDOT approved publication in my possession.

Signature of Authorized Agent

**C PURCHASER INFORMATION**

First Name	Middle Name	PA DOB/Photo ID#	Date of Birth
Spouse, As Co- Purchaser/Last Name	First Name	Middle Name	

**D PURCHASER/SELLER EXPLANATION**

Explain in detail why the purchase price listed on Form MV-1, MV-4ST, MV-217 or Applicant Summary Statement is less than 80% of the average Fair Market Value, or if the vehicle is over 15 years old and the purchase price is less than \$200, explain how the purchase price was determined, or if the vehicle is not listed in a PennDOT approved publication, explain how the purchase price as listed in Section A was determined. Please use additional paper if more space is required. **NOTE TO PURCHASER:** An item received from the seller of this vehicle, along with either your copy of the Application for Certificate of Title (MV-1), the Vehicle Sales and Use Tax Reply to the Department of Revenue, you will be assessed for the estimated amount of tax due.

Dad motor

**E SEAL AND SIGNATURE OF SELLER - NOT REQUIRED FOR VEHICLES PURCHASED OUT-OF-STATE**SUBSCRIBED AND SWORN  
TO BEFORE ME:MONTH 5 DAY 1 YEAR 09

I/We state that I/We have read and signed this form after its completion, and I/We swear or affirm that the statements made herein are true and correct, and that any statement made on or pursuant to this form is subject to the penalties of 18 PA C.S. Section 4903(a)(2)(relating to false swearing), which shall include punishment of a fine not exceeding \$5,000, or to a term or imprisonment of not more than two years, or both.

Signature of Seller

Signature of Co-Seller

Telephone Number ( )

**F SEAL AND SIGNATURE OF PURCHASER**SUBSCRIBED AND SWORN  
TO BEFORE ME:MONTH 5 DAY 1 YEAR 09

I/We state that I/We have read and signed this form after its completion, and I/We swear or affirm that the statements made herein are true and correct, and that any statement made on or pursuant to this form is subject to the penalties of 18 PA C.S. Section 4903(a)(2)(relating to false swearing), which shall include punishment of a fine not exceeding \$5,000, or to a term or imprisonment of not more than two years, or both.

Signature of Purchaser

Signature of Co-Purchaser

Telephone Number ( )

MAY 04 2009

090345

THIS FORM MAY BE PHOTOCOPIED

Messenger No.

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